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December 1, 2017

VIA ECF

The Honorable Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square New York, NY 10007

Re: *In Re Terrorist Attacks on September 11, 2001*; 03-md-1570 (GBD)(SN)
The Charter Oak Fire Ins. Co. et al v. Al Rajhi Bank et al; 1:17-cv-02651
Sheps Law File No.: 7094

Dear Judge Netburn:

If you recall, we represent The Charter Oak Plaintiffs in the above referenced matter (the "Charter Oak Action").

In accordance with this Court's Order dated June 2, 2017, *ecf* no. 3621, we write to provide a status update as to Plaintiffs' claims against certain Non-Sovereign Defendants named in Plaintiffs' complaint. We were directed to write to this Court by today.

With respect to those defendants who have appeared and have been active in the MDL litigation (The Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Dallah Avco Trans Arabia), we have spoken with each of their respective counsel concerning a Stay of Service of Plaintiffs Charter Oaks' claims against them for a five (5) month period until May 1, 2018. During such time we would not serve the filed complaint against them nor require an Answer or any response from them. All of the respective counsel for these parties have consented to this stay.

We believe that by the time this period expires we would likely have a decision on the three pending Motions to Dismiss filed by the other non-sovereigns (Al Rajhi Bank, National Commercial Bank and Saudi Binladin Group). We would expect those decisions to provide guidance in terms of proceeding on the pending claims against these additional non-sovereigns who have yet to be served. We can expedite our status report to the Court if decisions are rendered earlier. This approach would save considerable time and expense for the parties and this Honorable Court.

Accordingly, we hereby request permission to submit a stipulation to be "so ordered" by the Court to continue to stay of such service by the Charter Oak Plaintiffs until May 1, 2018 with respect to The Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, Al Haramain Islamic Foundation,

Hon. Sarah Netburn, U.S.M.J.

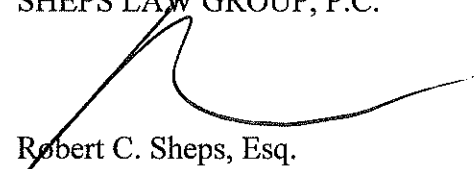
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Dallah Avco Trans Arabia, and Mohamed Binladin Company/Mohamed Binladin Organization.

Thank you for your kind consideration.

Respectfully submitted,

SHEPS LAW GROUP, P.C.



Robert C. Sheps, Esq.

cc: All Counsel *via ECF*

The Charter Oak Plaintiffs' proposal is approved, and their claims against the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, Al Haramain Islamic Foundation, Dallah Avco Trans Arabia, and Mohamed Binladin Company/Mohamed Binladin Organization are STAYED until May 1, 2018. On that date, the Plaintiffs are to file a letter reporting to the Court their intentions as to these claims. In the event that the Court decides the motion to dismiss filed by the other non-sovereign defendants before that date, the Charter Oak Plaintiffs shall file their letter with the Court within three business days of the Court's decision. In the event that Plaintiffs choose to dismiss these claims before May 1, 2018, they shall file appropriate stipulations of dismissal. **SO ORDERED.**



SARAH NETBURN

United States Magistrate Judge

December 4, 2017
New York, New York